

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re:

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.<sup>1</sup>

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**INFORMATIVE  
MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD REGARDING DECEMBER 15–16, 2021 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for December 15–16, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 19430], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; (iii) Laura Stafford, lstafford@proskauer.com; and (iv) Ehud Barak, ebarak@proskauer.com of Proskauer Rose LLP.

2. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report.

3. Ehud Barak of Proskauer Rose LLP will be available to address questions, if any, related to the *Tenth Motion of the Puerto Rico Electric Power Authority for Entry of Order Pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure Further Enlarging the Time Within Which to File Notices of Removal Pursuant to Bankruptcy Rule 9027* [Case No. 17-3283, ECF No. 19276; Case No. 17-4780, ECF No. 2656].

4. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the (i) Debtor's Three Hundred Seventy-Fourth Omnibus Objection to Claims Nos. 174661, 174604, and 174660 [Case No. 17-3283, ECF No. 17923] and (ii) Debtor's Three Hundred Eighty-Eighth Omnibus Objection to Claims Nos. 51426 and 51476 [Case No. 17-3283, ECF No. 17931].

5. Martin J. Bienenstock, Brian S. Rosen, Laura Stafford, and Ehud Barak reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

[*Remainder of page intentionally left blank*]

**WHEREFORE**, the parties respectfully request that the Court take notice of the foregoing.

Dated: December 10, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock  
Martin J. Bienenstock  
Brian S. Rosen  
Paul V. Possinger  
Ehud Barak  
(Admission *pro hac vice*)  
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**EXHIBIT A**

**PARTY APPEARANCE COVER SHEET**

PARTY APPEARANCE COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico
Party Name Abbreviation (For Use with Zoom)	FOMB
Omnibus Hearing Participant  Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"><li>• Name,</li><li>• Email,</li><li>• Law Firm,</li><li>• Phone Number</li><li>• Docket Entry No. for the Attorney's Notice of Appearance</li><li>• Zoom Screen Name</li></ul>	Martin J. Bienenstock <a href="mailto:mbienenstock@proskauer.com">mbienenstock@proskauer.com</a> Proskauer Rose LLP 212-969-4530 Docket Entry No. 90 FOMB/ Bienenstock, Martin/ Proskauer Rose LLP
	Brian S. Rosen <a href="mailto:brosen@proskauer.com">brosen@proskauer.com</a> Proskauer Rose LLP 212-969-3380 Docket Entry No. 1902 FOMB/ Rosen, Brian/ Proskauer Rose LLP
	Ehud Barak <a href="mailto:ebarak@proskauer.com">ebarak@proskauer.com</a> Proskauer Rose LLP 212-969-4247 Docket Entry No. 90 FOMB/ Barak, Ehud/ Proskauer Rose LLP
	Laura Stafford <a href="mailto:lstafford@proskauer.com">lstafford@proskauer.com</a> Proskauer Rose LLP 617-526-9714 Docket Entry No. 4967 FOMB/ Stafford, Laura/ Proskauer Rose LLP